

REMARKS

Examiner has objected to Claims 1-10, stating that "line 1 should be only system and not "system and method." In response, Applicant has amended Claims 1-10 to remove the words "and method" pursuant to Examiner's objection.

Examiner has rejected Claims 1-2 and 4-5 under 35 U.S.C. § 102(e) as being unpatentable over *Choi* (US 6,275,741). In response thereto and to further clarify Applicant's invention, Applicant has amended Claim 1 to more succinctly claim Applicant's device, and respectfully traverses Examiner's rejections with respect to the specific embodiments of Applicant's device as claimed herein.

Applicant respectfully traverses Examiner's rejection regarding *Choi*, wherein *Choi* refers to controls **within** an injection molding machine for purposes of operationally controlling the machine. Applicant's invention, as described, is dissimilar, in that it is designed to perform as a standalone inspection device that could feed back inspection results to **any** production process. See, e.g. P. 4, lines 1-9. Thus, although the present invention is suitably described relative to a part-forming machine, it is specifically **not** limited thereto, wherein *Choi* is self-described and titled as a control for an injection molding system. Applicant's described system is flexibly defined, unlike *Choi*, thereby enabling utilization

for essentially any type of sensory inspection application.

In practice, with respect to the exemplary application of a parts forming machine, the status of molded parts is communicated via the digital I/O of the machine, wherein Applicant's device is not actually a sensor on a machine, but is an **external** vision **system** with its own CPU, preferably adapted for wireless capabilities, thereby lending to its unique flexibility to a variety of inspection-related applications. Thus, the results of inspection of **any** process can be communicated wirelessly between digital I/O devices on a machine and on the inspection computer.

Referencing page 3, lines 13-19, Applicant's device is, appropriately, broadly self-described as an "inspection system and method for verifying the presence, absence and/or quality of a target," wherein the invention is specifically defined as "not limited to" molded part forming applications. The independent nature of Applicant's sensory system, and the idea of wireless communication between digital I/O devices on the vision inspection system and the manufacturing machine **are** unique and can be applied to many processes that need inspection.

With respect to the specific embodiments described by Applicant in the pending claims of this present application, the improvement taught by Applicant's device is distinct from *Choi*. *Choi* is directed

toward a central computer platform for controlling a plurality of injection molding devices, in order to streamline the operator interface by eliminating the programmable logic controller intermediary. This is unlike Applicant's invention, wherein an independent inspection station is able to be quickly and easily incorporated and utilized, via a preferred wireless configuration, to essentially **any** process or environment requiring inspection via a sensor, preferably a vision sensor suitable to the particular inspection application. *Choi* describes no such application and, further, is not adaptable to such.

Choi does **not** describe any sensory component capable of inspection. Any use of the word "sensor" by *Choi* is simply in reference to "well-known" (Col. 4, lines 43-45) machine element signals. There is **no** discussion of quality assurance or quality control functionality as is offered and specifically the focus of Applicant's device. Applicant's sensory inspection system facilitates automated quality control via real time sensory assessment, or comparative measuring/analysis, of essentially any target. Therefore, Applicant respectfully asserts that *Choi* clearly does not teach, describe or anticipate Applicant's invention.

Applicant respectfully notes that all the claim limitations must be taught/found in the prior art. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). In light of Applicant's present

amendment to clarify that Applicant's sensor is qualitative, and further, in order to more succinctly state that the target site of Applicant's inspection is virtually limitless, to offer a selectable grouping of target site possibilities via the wording "wherein said at least one target site is selected from the group of a formed part, a molded part, a mold, a semiconductor, a machined part, a fuel cell cavity, or a jet engine," Applicant respectfully asserts that all the claim limitations of Applicant's invention are not found in the prior art.


Examiner has rejected Claims 6-8 under 35 U.S.C. § 103(a) as being unpatentable over *Choi* ('741) in view of *Kachnic et al.* (US 5,928,578), and Claims 3, 9-10 and 27-30 under 35 U.S.C. § 103(a) as being unpatentable over *Choi* ('741) in view of *Wunder* (US Appl. 2003/0195649). As referenced hereinabove with respect to *Choi*, Applicant's invention is clearly distinguished, and again, Applicant respectfully traverses Examiner's rejection. However, also in response thereto and to further clarify Applicant's invention, Applicant has amended Claims 1, 27-28 and has added Claim 31 to more succinctly describe the qualitative aspect of Applicant's sensor, as well as the remote nature relative to the target, which is facilitated via the preferred wireless configuration. Further, Applicant has specifically claimed that the target site could be positioned within a cavity.

Applicant believes that the foregoing amendments and arguments distinguish the claims over the prior art, thereby placing the rejected independent Claims 1, 27 and 28, and all remaining depending claims in condition for allowance.

CONCLUSION

The above-made amendments are to form only and thus, no new matter was added. Applicant respectfully believes that in view of the above remarks, the above-made amendments place the Claims and application in condition for allowance. Should the Examiner have any further questions and/or comments, Examiner is invited to telephone Applicant's undersigned Attorney at the number below.

Respectfully submitted, this 7th day of August, 2006.



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